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August 5, 2003

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Portals
Washington, DC 20554

Re: ***Ex Parte***
CC Docket No. 03-167

Dear Secretary Dortch:

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this will provide notice that Gavin McCarty, Chief Legal Officer, Gregory Robertson, Chief Financial Officer, Eric Wince, Chief Technology Officer, of Globalcom, Inc. ("Globalcom") and the undersigned, on behalf of Globalcom, met with Pamela Arluk, Irashad Abdal-Haqq, Cathy Carpino, John Hays, Rodney McDonald, Jennifer McKee, Jeremy Miller, Deena Shetler, Marv Sacks, and Jeffrey Tignor of the Wireline Competition Bureau on August 4, 2003 and presented Globalcom's position regarding SBC's 271 Application in Illinois and Wisconsin.

In particular, Globalcom explained that SBC is not in compliance with checklist item 2 because SBC's nonrecurring charges for Enhanced Extended Links ("EELs") in Illinois are not TELRIC-based for the reasons set forth in the documents that are attached which were handed out during the meeting.[1] In addition, Globalcom discussed its billing dispute with SBC regarding the application of EEL NRCs and explained that SBC's 271 application in Illinois is not in the public interest because SBC's EEL NRCs impede Globalcom's ability to compete in the Illinois marketplace. For similar reasons, Globalcom explained that SBC-WI's NRCs for EELs are excessive and not reasonable under TELRIC. Globalcom therefore recommended that the FCC

[1] Please note that the QSI report that is attached will be submitted with Globalcom's August 6, 2003 comments and will be revised to reflect the nonrecurring charges SBC assesses for certain EEL combinations in Nevada.

deny SBC's 271 Application for Illinois and Wisconsin unless SBC immediately reduces these nonrecurring rates in these states so that they mirror California benchmark rates.

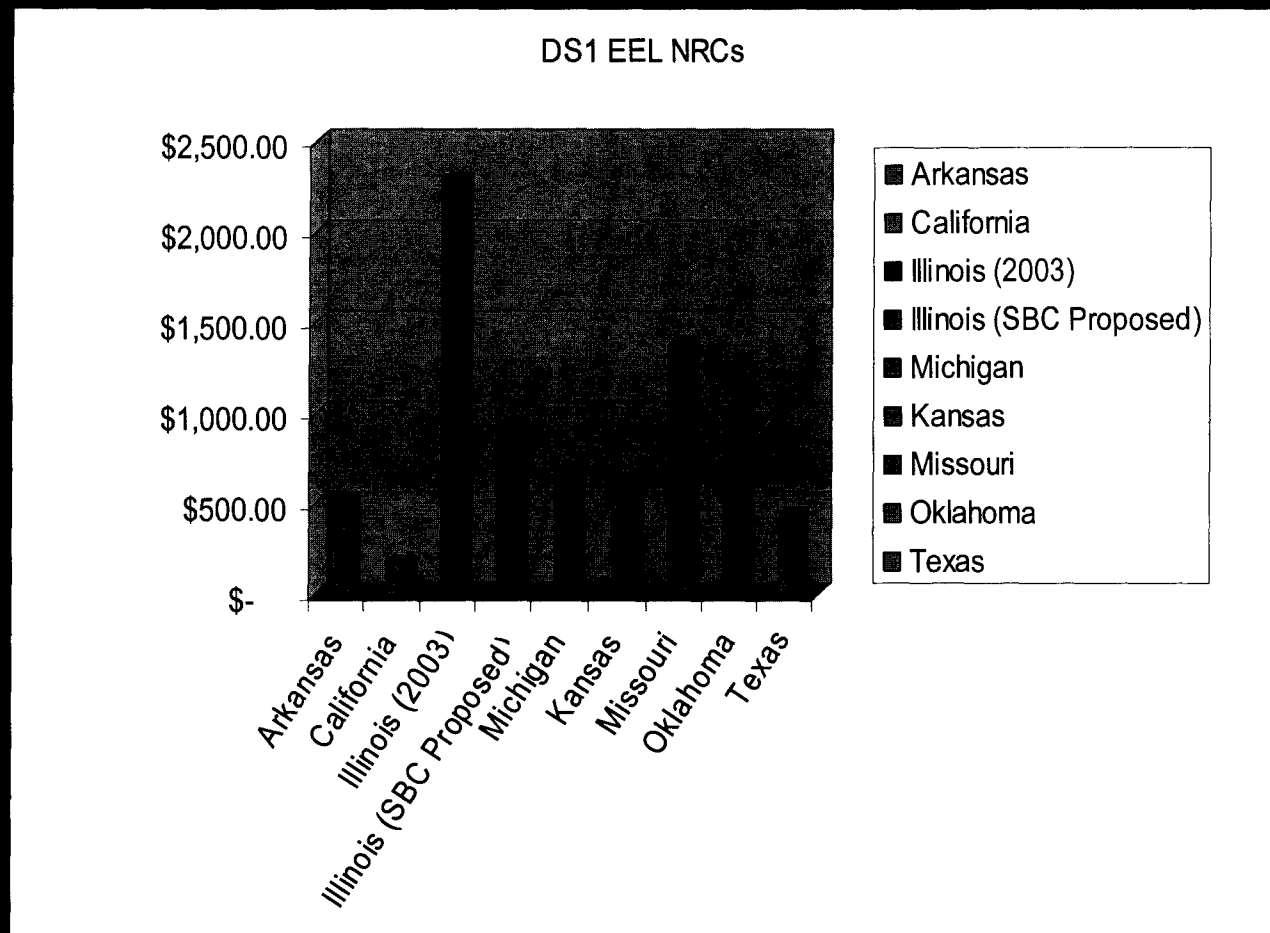
Sincerely,

Eric J. Branfman
Philip J. Macres

Attachments

cc:
Pamela Arluk, FCC
Irashad Abdal-Haqq, FCC
Cathy Carpino, FCC
John Hays, FCC
Rodney McDonald, FCC
Jennifer McKee, FCC
Jeremy Miller, FCC
Deena Shetler, FCC
Marv Sacks, FCC
Jeffrey Tignor, FCC
Gavin McCarty, Globalcom
Greg Robertson, Globalcom
Eric Wince, Globalcom
Kevin Walker, SBC (all via e-mail)

Comparison of EEL NRCs



Comparison of Currently Tariffed and Proposed Rates
4 wire Digital Loop to DS1 Dedicated Transport*

	Current	Proposed
Loop		
– Admin	$ 142.93	
– Design and CO Connection	$ 332.61	
– Carrier Connection	$ 185.48	
– Service Order Charge		$ 78.75
Transport		
– Admin	$ 406.61	
– Design and CO Connection	$ 632.71	
– Carrier Connection	$ 585.51	
– 4 wire DS1 loop to DS1 IOT		$ 858.83
Total	**$2,285.85**	**$ 937.58**
– Excludes Clear Channel		
– Clear Channel	$ 443.18	$ 150.42

*Based on testimony of SBC Witness M.D. Silver in ICC Docket No. 02-0864, Ex. 12

QSI CONSULTING
Market Solutions • Litigation Support

SBC'S NRCs FOR EELs IN ILLINOIS
Analysis performed by QSI for GlobalCom

August 4, 2003

Prepared by:
August H. Ankum, Ph.D
James Webber

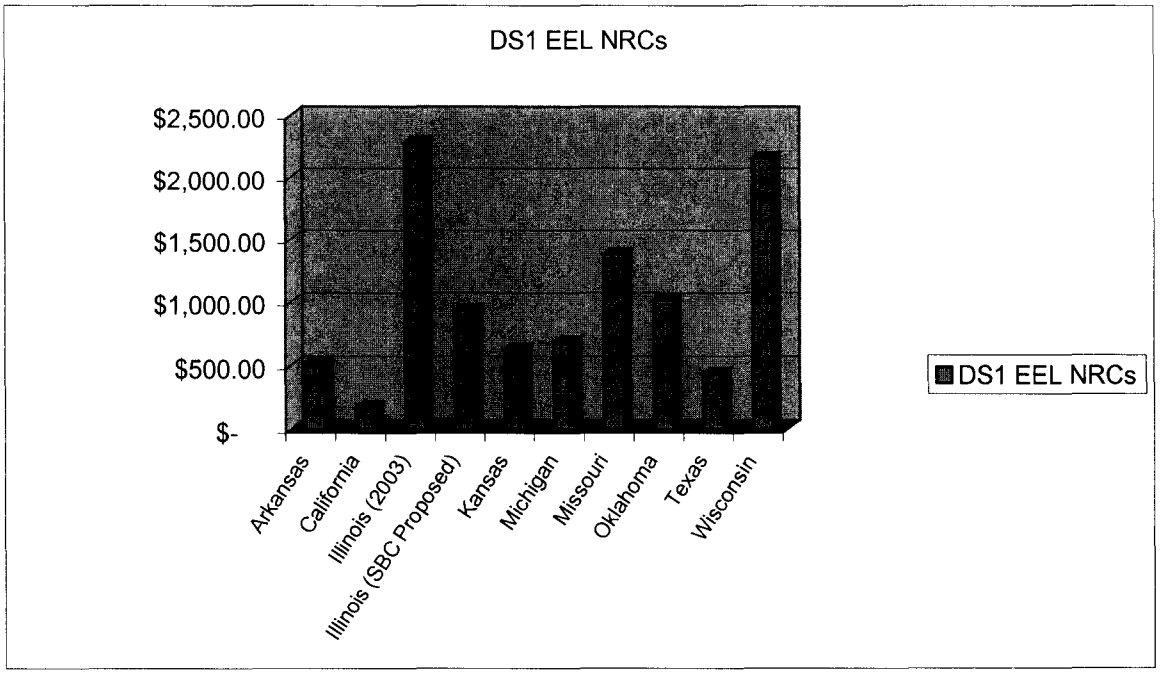
Table of Contents

Attachments

I. INTRODUCTION AND SUMMARY

SBC's currently tariffed NRCs for New EELs in Illinois are significantly above TELRIC, both in terms of their relative magnitude vis-à-vis TELRIC based NRCs in other states and relative to appropriately TELRIC based NRCs as calculated for Illinois.

The bar graph below shows the comparison with NRCs in other states and with the NRCs recently proposed by SBC itself in ICC Docket 02-0864.[1] The EEL for which the NRCs were compared consists of a 4-Wire Digital Loop to DS1 Level Transport without collocation and without Clear Channel capability. The analysis assumes that service orders are submitted electronically. It is clear from this graph that SBC's NRCs for EELs in Illinois are too high.



For purposes of the analysis in this document, NRCs for EELs are viewed as recovering the costs of service ordering and service provisioning of the loop, transport and cross-connect and multiplexing components of the EEL. This definition follows the definitions provided by SBC itself in ICC Docket 02-0864.

Further, the analyses performed in this document follow the FCC's convention of comparing tariffed rates in one state to those that prevail in other states where such a

[1] The details of this graph are discussed below. The graph is taken from the attachment, which contains all the underlying data and calculations in Excel.

comparison is reasonable. Specifically, in CC Docket No. 01-9, paragraph 28, the FCC found:

> We find that it is permissible to rely on the New York rates in this application because they meet the criteria the Commission established in the *SWBT Kansas/Oklahoma Order*. In the *SWBT Kansas/Oklahoma Order*, to determine whether Oklahoma rates were within the ***range of what a reasonable*** application of what TELRIC would produce, the Commission compared SWBT's rates in Oklahoma to its rates in Texas. The Commission stated this was permissible because: 1) they have a common BOC and geographic similarities; 2) they have similar, although not identical, rate structures for comparison purposes; and 3) the Commission had already found the rates in Texas to be reasonable.[2] Applying this standard to Verizon's Massachusetts rates, we find that New York is a permissible state for UNE rate comparison purposes. The states are adjoining, they have similar rate structures, the Commission has found the New York rates are within a zone that is consistent with TELRIC based on current information in the record, and it is the same BOC in both states. (Emphasis added.)

This document provides support for the claim that SBC's NRCs for EELs in Illinois are too high based on the following facts and analyses:

1. SBC's NRCs for EELs in Illinois are significantly higher than those in other SBC states. No explanation has been offered for these disparities; therefore, either the rates in the other SBC states are well below TELRIC costs, or (much more likely), the rates in Illinois are much above TELRIC costs.

2. SBC's currently tariffed NRCs for EELs are significantly higher than the TELRIC costs advocated by SBC itself in its testimony in ICC Docket 02-0864.

3. SBC's NRCs for EELs should be evaluated on a standalone basis and not in combination with the recurring charges for EELs in Illinois, which because they are low relative to recurring charges in other states would disguise the problems with the NRCs.

In what follows, each of these issues is discussed in more detail.

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[2] *SWBT Kansas/Oklahoma Order* at para. 82.

II. SBC'S NRC'S FOR EELS IN ILLINOIS ARE SIGNIFICANTLY HIGHER THAN THOSE IN OTHER SBC STATES

SBC's NRCs for EELs in Illinois were compared to SBC's NRCs for EELs in other states. For purposes of this analysis, the EEL consists of a 4-Wire Digital Loop connected to a DS1 Level Dedicated Transport link without collocation and without Clear Channel capability.[3] As noted previously, the NRCs include the service ordering and service provisioning NRCs. Further, the NRCs are calculated based on the assumption that service orders are submitted by the CLEC through electronic interfaces.

The results of that comparison are as follows.

State		DS1 EEL NRCs	SBC Illinois EEL NRCs relative to NRCs in other states
Arkansas	$	523.37	437%
California	$	173.10	1321%
Illinois (2003)	**$**	**2,285.85**	**100%**
Illinois (SBC Proposed)	$	937.58	244%
Kansas	$	627.90	364%
Michigan	$	685.18	334%
Missouri	$	1,384.58	165%
Oklahoma	$	1,018.05	225%
Texas	$	440.25	519%
Wisconsin	$	2,159.08	106%

As the above table shows, SBC's NRCs for EELs in Illinois are significantly higher than those in other states. For example, the EEL NRCs in Illinois are an astonishing *1321 percent and 519 percent* of the NRCs in two other SBC states, California and Texas, respectively.

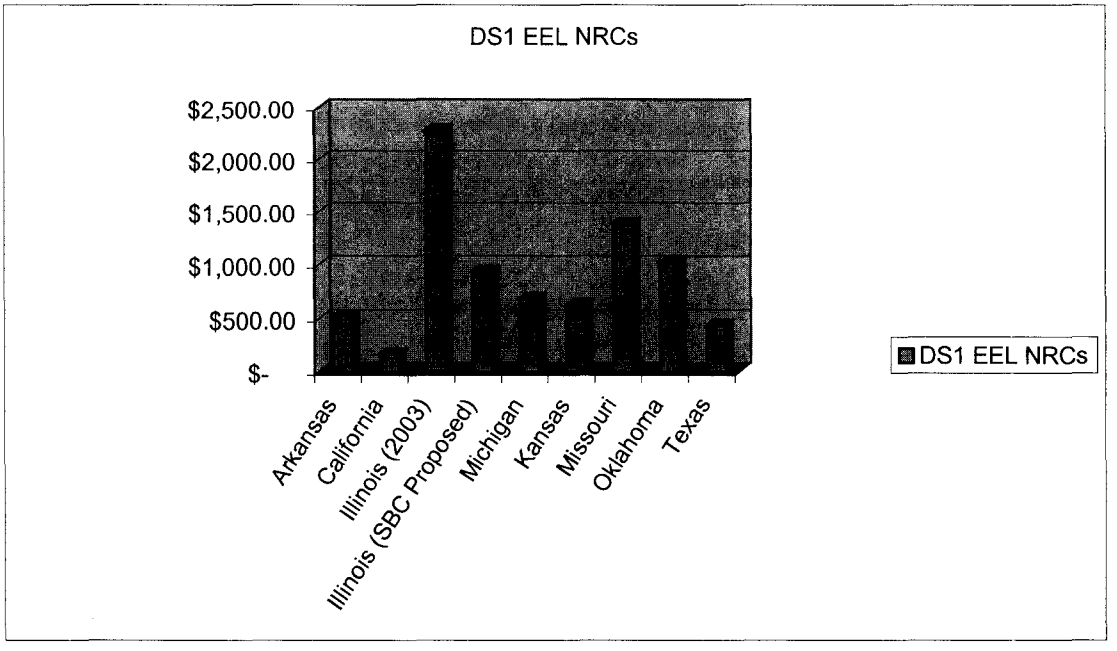
There is simply no reasonable explanation for a discrepancy of this magnitude given the nature of the costs and activities involved in service ordering and service provisioning. Of course, the TELRICs supporting recurring charges for EELs (loops and transport) will reasonably vary from state to state depending on such issues as population density, loop lengths, and other cost drivers. None of these issues, however, affect the NRCs.

The NRCs recover the costs of *service ordering* and the cost of *service provisioning.* Service ordering costs consist in an efficient setting of the costs of electronically placed orders.[4] Service provisioning costs consist almost entirely of the labor costs for

[3] While the analyses presented herein focus upon this particular type of EEL, because it is the one predominantly used by Globalcom, the analyses are not significantly different for other types of EELs.
[4] SBC's NRC cost studies in Illinois are discussed in more detail below.

establishing cross-connects at various locations, travel to get to those locations (end-user premises and unmanned central offices) and testing (of various types) of the cross-connects and newly connected facilities. Except for travel times, which may vary minimally from state to state, there is no reason for why these costs should be different in one state versus another.[5] This is particularly true for SBC states that share service ordering centers, such Illinois and Michigan, where the service ordering costs should practically be identical. In short, SBC's NRCs for EELs ought to be reasonably comparable.

The numeric comparison discussed above is graphically represented by the following bar graph:



The data underlying the results and the bar graph are found in the Excel workbook labeled as Attachment I to this document.

It must be noted that while the analysis was performed for the NRCs for EELs consisting of a 4-Wire Digital Loop to DS1 Level Transport, the pattern for EELs of different levels of capacity is approximately the same. That is, the above results are representative for all of SBC's NRCs related to EELs.

The possible configurations of EELs for which SBC's NRCs in Illinois are higher than TELRIC can be summarized as follows:

[5] While it is true that labor rates may differ from state to state, labor rates in Illinois are not significantly different from labor rates in, say, California. Further, whatever labor rate differences may exist, they in no way could explain the vast discrepancies and variations in the NRCs.

2-Wire Analog Loop to DS1 or DS3 Dedicated Transport Facilities - Collocated
4-Wire Analog Loop to DS1 or DS3 Dedicated Transport Facilities - Collocated
2-Wire Digital Loop to DS1 or DS3 Dedicated Transport Facilities - Collocated
4-Wire Digital Loop (DS1 Loop) to DS1 or DS3 Dedicated Transport Facilities – Collocated

2-Wire Analog Loop to DS1 or DS3 Dedicated Transport Facilities - Non-Collocated
4-Wire Analog Loop to DS1 or DS3 Dedicated Transport Facilities - Non-Collocated
2-Wire Digital Loop to DS1 or DS3 Dedicated Transport Facilities - Non-Collocated
4-Wire Digital Loop (DS1 Loop) to DS1 or DS3 Dedicated Transport Facilities - Non-Collocated

Again, this document reports only on NRCs for the 4-Wire Digital Loop to DS1 Level Dedicated Transport - Non-Collocated and without Clear Channel capability.

Using the FCC's zone of reasonableness analysis -- as discussed previously -- it must be concluded that SBC's NRCs for EELs in Illinois are significantly higher than TELRIC.

III. SBC'S CURRENTLY TARIFFED NRCS FOR EELS ARE SIGNIFICANTLY HIGHER THAN THOSE PROPOSED BY SBC ITSELF IN ITS TESTIMONY IN ICC DOCKET 02-0864

SBC recently filed newly proposed NRCs for EELs and other UNEs in ICC Docket 02-0864. While the docket was prematurely abated, SBC had filed its affirmative case and intervenors did have an opportunity to examine SBC's newly proposed costs and rates.[6] SBC's newly proposed NRCs in Illinois, therefore, provide yet another benchmark for how reasonable or not reasonable SBC's currently tariffed NRCs might be.

A. Even SBC's Own Uncorrected Studies in Illinois Show Significantly Lower NRCs for EELs

SBC's own studies filed in ICC Docket 02-0864 show NRCs for EELs that are approximately 41 percent of the currently tariffed NRCs for EELs. The two tables below show the various rate elements under the current tariff and as filed by SBC in ICC Docket 02-0864.

As the tables show, the rate elements do not match up precisely since SBC proposed to change the rate structure. The bottom line totals for the 4-Wire Digital Loop to DS1 Dedicated Transport EEL without collocation and without Clear Channel capability are calculated consistent with the testimony filed by SBC itself. Specifically, the rate structure and the applicable rates for SBC's current NRCs for EELs in Illinois are taken from the testimony of SBC witness Michael D. Silver.[7] It must be noted, however, that SBC's current tariff is not unambiguous on which NRCs do apply.[8]

[6] The proceeding was prematurely abated as a result of legislative action that was found to be illegal by a Federal District Court. See *Voices for Choices v. Illinois Bell Tel. Co.*, No. 03 C 3290, 2003 U.S. Dist. LEXIS 9548 (N.D. Ill. June 9, 2003) (Kocoras, J.) *appeals pending*, Nos. 03-2735 & 03-2766.

[7] See ICC Docket 02-0864, Testimony of SBC witness M.D. Silver, Exhibit MDS 12.

[8] Ameritech Illinois Tariff, Part 19, Section 20, 3rd Revised Sheet appears to suggest that there would be only three rate elements: administration charge, design and C.O. connection charge and a carrier connection charge. The analysis in this document, however, has followed the testimony of M.D. Silver.

Currently Tariffed NRCs 4-Wire Digital Loop to DS1 Dedicated Transport

Loop		
	Admin	$ 142.93
	Design and CO Connection	$ 332.61
	Carrier Connection	$ 185.48
Transport		
	Admin	$ 406.61
	Design and CO Connection	$ 632.71
	Carrier Connection	$ 585.51
	Total (excluding clear channel)	***$ 2,285.85***
	Clear Channel	$ 443.18

SBC Proposed NRCs 4-Wire Digital Loop to DS1 Dedicated Transport - Docket 02-0864[9]

Loop		
	Non Channelized DS1 SO	$ 78.75
Transport		
	4-Wire DS1 Loop to DS1 Transport	$ 858.83
	Total (excluding clear channel)	**$ 937.58**
	Clear Channel	$ 150.42

Thus, as the above comparison shows, SBC itself has testified that its current rates are approximately *2.4 times* what SBC contends are its TELRIC costs.

B. SBC's Current NRCs for EELs Appear Even More Unreasonable Compared to SBC's Newly Proposed NRCs in Illinois After Those NRC Studies Are Corrected for Non-Compliance with ICC Orders

The above comparison between SBC's current NRCs and the NRCs it proposed in Docket 98-0396 does not consider, however, that SBC's newly proposed NRCs for EELs

[9] These NRCs are based on the testimony of SBC witness M.D. Silver in ICC Docket No. 02-0864, Exhibit 12.

were not adjusted downward yet to correct for some of the ICC's instructions regarding SBC's NRC studies in Docket 98-0396.

In Docket 98-0396, the ICC had previously reviewed and rejected Ameritech's NRC studies. Those studies were rejected because they did not comply with previous ICC Orders, and for a number of other important reasons identified and discussed in the ICC's Final Order in Docket 98-0396. Review of SBC's new NRC studies has shown that the company has yet again failed to implement the ICC's Orders. It is worthwhile to briefly recapitulate the ICC's more important findings in Docket 98-0396 regarding required assumptions that should have -- but did not -- form the basis for SBC's NRC studies. Indeed, SBC ignored virtually all of the explicit ICC findings listed below.[10]

OSS Enhancements, Flow-Through and Fall-Out Rates

-- NRC studies should "take into consideration the increased flow through that should result from the OSS enhancements being implemented pursuant to Ameritech's merger agreement."

-- NRC studies should assume -- not manual intervention -- but rather "the use of primarily automated interfaces."

-- SBC should change "a single assumption, that orders would be placed through a fully automated process."

-- SBC should "provide [...] written reports or other support for its flow through rates and [...] use a single fallout factor for the complete end-to-end connect/disconnect processes; rather than view each process step in isolation.

Use of Existing Network Architecture and Process in Studies

-- NRC studies should not be "based on [SBC's] existing network architecture and processes and incorporate only those technologies and process improvements that [SBC] actually plans to deploy in the next three years. This is the antithesis of a forward looking cost study [...] because it encompasses actual rather than forward looking technologies and processes.

Clean-Up of legacy Databases

-- SBC's NRC studies should make "adjustment for [SBC] cleaning up and then maintaining its databases to eliminate fallout caused by database contamination."

-- SBC NRC studies should perform a "root cause analyses to seek out and resolve problems causing fallout [and] distinguish between fallout resolution costs

[10] The following findings are taken from Docket 98-0396, Commission Analysis and Conclusions, pages 39 - 42.

and the costs associated with planned/designed manual intervention due to fallout."

Computer Processing Costs

-- SBC "should eliminate the computer processing costs it applies per service order. These costs are not a direct cost to a CLEC ordering a UNE."

SME Work Times Estimates

-- Work times in SBC's cost studies should be adequately supported and not be "based on subjective SME interviews."

-- SBC should "provide very specific backup information, including identification and documentation of forward looking workflows, identification of estimators, the development of detailed written estimation instructions, provisions for averaging the individual estimates, development of documentation, etc."

As noted, SBC failed to incorporate these findings into its current NRC studies. In fact, it was "déjà vu all over again," with SBC challenging the ICC and the parties to yet another exhausting round of litigation on the very same issues.

In Docket 98-0396, the ICC found that "Ameritech's failure to comply with our directives results in nonrecurring charges that are *severely inflated.*"

SBC's failure to comply with the ICC's previous orders and to file studies that are consistent with TELRIC was pervasive.

QSI Consulting, Inc., on behalf of a coalition of CLECs,[11] examined and corrected SBC's NRC studies. Implementing the ICC's previous orders on NRCs (as discussed above), QSI calculated rates for the 4-Wire Digital Loop to DS1 Level dedicated Transport EEL that were considerably lower. As found in Attachment 3 to the QSI (Ankum/Morrison panel) testimony, the comparison between SBC's newly proposed NRCs and the QSI/CLEC corrected SBC NRCs is as found below:

[11] MCI, Inc., McLeodUSA Telecommunications Services, Inc., Covad Communications Company, TDS Metrocom, LLC, Allegiance Telecom of Illinois, Inc., RCN Telecom Services of Illinois, LLC, Globalcom, Inc., Z-Tel Communications, Inc., and XO Communications, Inc.

		SBC	QSI/CLECs
Loop			
	Non Channelized DS1 SO	$ 78.75	$ 1.62
Transport			
	4-Wire DS1 Loop to DS1 Transport	$ 858.83	$ 191.95
	Total (excluding clear channel)	**$ 937.58**	**$ 193.57**
	Clear Channel	$ 150.42	$ 6.84

Because of flaws in SBC's TELRIC studies, they grossly overstate actual TELRIC costs. When appropriate adjustments are made (as recommended by QSI), it can be seen that actual TELRIC costs are far lower than shown by SBC's studies, making the tariffed rates even more out of line with TELRIC costs. In fact, based on QSI's recalculation of SBC's newly proposed NRCs, SBC's currently tariffed NRCs for EELs in Illinois are about *11 times higher* than TELRIC based rates ($2,285.85 versus $193.57).

IV. SBC'S NRCS FOR EELS SHOULD BE EVALUATED ON A STANDALONE BASIS AND NOT IN COMBINATION WITH THE RECURRING CHARGES FOR EELS IN ILLINOIS

In Docket No. 01-0662, SBC's 271 Application in Illinois, SBC presented an analysis that combined the NRCs and the monthly recurring charges ("MRCs") for EELs. (See testimony of M. D. Silver.) This type of an analysis is inappropriate. In fact, it is important that an analysis of whether SBC's NRCs are within a zone of reasonableness is performed on a standalone basis. The costs recovered in the NRCs are fundamentally different and separate from the cost recovered by the recurring charges. To combine the analysis of NRCs with MRCs would allow for a serious cross-subsidization between disparate activities and investments that is at odds with TELRIC.

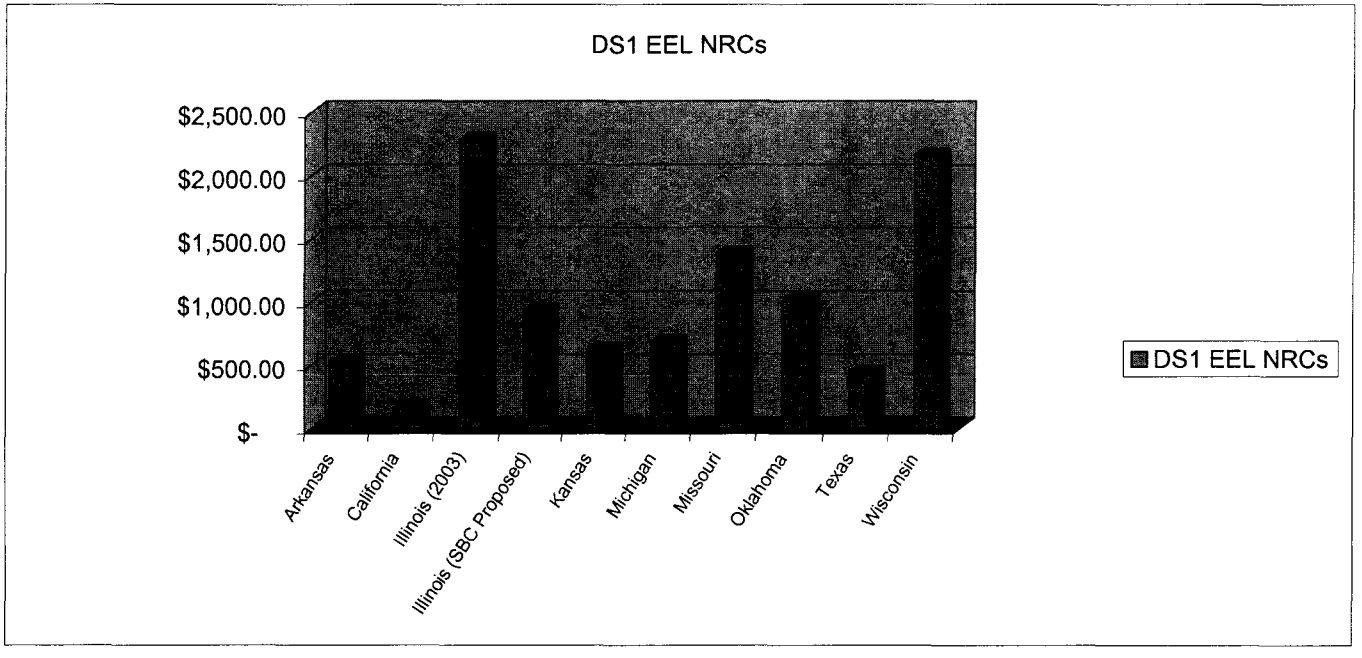
As noted above, NRCs recover the costs of *service ordering* and the cost of *service provisioning*. Service ordering costs consist in an efficient setting of the costs of electronically placed orders with a 2% fall out approved by the ICC.[12] Service provisioning costs consist almost entirely of the labor costs for establishing cross-connects at various locations, travel to get to those locations (end-user premises and unmanned central offices) and testing (of various types) of the cross-connects and newly connected facilities.

By contrast, the MRCs recover the costs, such as maintenance, depreciation, and cost of capital, of the physical *loop and transport facilities*. These cost categories are very different from the service ordering and service provisioning cost categories and activities. Thus, to combine the NRCs and the MRCs for EELs is to permit serious cross-subsidization between disparate activities and investments.

Further, an observation that SBC's MRCs in IL may be lower relative to those in other states has no impact whatsoever on what appropriate TELRIC based NRC costs should be. There is no evidence to suggest, nor has SBC pointed to any, that costs that would ordinarily be treated as recurring (e.g. in other states) have been shifted into the NRC category in Illinois. In terms of meeting the FCC's requirement that its UNE rates comply with TELRIC, the fact that the MRCs in Illinois are relatively low, therefore, does not justify an above-TELRIC NRC any more than a low port rate would justify a high loop rate.

[12] For a discussion of why SBC's NRCs do not comply with the ICC's 2% fall out requirement, see the previous section.

State		DS1 EEL NRCs	SBC Illinois EEL NRCs relative to NRCs in other states
Arkansas	$	523.37	437%
California	$	173.10	1321%
Illinois (2003)	**$**	**2,285.85**	**100%**
Illinois (SBC Proposed)	$	937.58	244%
Kansas	$	627.90	364%
Michigan	$	685.18	334%
Missouri	$	1,384.58	165%
Oklahoma	$	1,018.05	225%
Texas	$	440.25	519%
Wisconsin	$	2,159.08	106%



Arkansas DS1 EEL (NRCs)

		Rate
DS1 Loop	$	68.40
DS1 Cross Connect	$	73.88
DS1 Loop Order	$	2.35
UDT DS1 EF	$	165.86
DS1 Cross Connect	$	73.88
DS1 Transport Order	$	2.35
UDT DS1 Transport	$	136.65
Total	**$**	**523.37**

California DS1 EEL (NRCs)

	DS1 Loop		DS1 Transport		
Order Type	**Service Order**	**Channel Connect**	**Service Order**	**Channel Connect**	***Total NRC***
Mannual - Fax	$ 63.06	$ 104.59	$ 72.75	$ 67.62	*$ 308.02*
Semi-mechanized	$ 35.09	$ 104.59	$ 46.65	$ 67.62	*$ 253.95*
Mechanized	**$ 0.16**	**$ 104.59**	**$ 0.73**	**$ 67.62**	***$ 173.10***

The NRCs for DS1 EELs in California are comprised of the following Charges: Digital Trunk DS1 Service Order at $0.73; Digital Trunk DS1 Connect at $67.62; Digital DS1 Link Service Order at $0.16; and, Digital DS1 Connect $104.59. Each of these individual rate elements are taken from the table entitled PACFIC BELL TELEPHONE COMPANY D/B/A SBC CALIFORNIA NON-RECURRING JUNE 12, 2003, which is available for downloading at https://clec.sbc.com/clec/shell.cfm?section=115#California, SBC's vendor website. Additionally, these NRCs are the same as those contained in Scenario No. 7 of Appendix A II to Attachment 8: Pricing of the Interconnection Agreement between AT&T and Pacific Bell, which is also available for downloading at CLEC Online. SBC witness Silver, however, has estimated these charges to be almost $30 higher than as presented in this table. Specifically, Witness Silver indicated at Revised Attachment MDS-2D (page 5) in ICC Docket 01-0662 suggests the charges would total $207.18.

"Current" Rate Structure - Per Ameritech's "recent" interpretation of tariff

Loop		
	Admin	$ 142.93
	Design and CO Connection	$ 332.61
	Carrier Connection	$ 185.48
Transport		
	Admin	$ 406.61
	Design and CO Connection	$ 632.71
	Carrier Connection	$ 585.51
	Clear Channel	$ 443.18
	Total (excluding clear channel)	***$ 2,285.85***

Proposed Rate Structure and Amounts

Loop		
	Non Channelized DS1 SO	$ 78.75
Transport		
	4-Wire DS1 Loop to DS1 Transport	$ 858.83
	Clear Channel	$ 150.42
	Total (excluding clear channel)	**$ 937.58**

Kansas DS1 EEL (NRCs)

		Rate	USOC
DS1 Loop	$	68.40	U4D1X
DS1 Cross Connect	$	98.50	UCXHX
DS1 Loop Order	$	2.35	NR9W2
UDT DS1 EF	$	221.15	UENHX
DS1 Cross Connect	$	98.50	UCXHX
DS1 Transport Order	$	2.35	NR9W2
UDT DS1 Transport	$	136.65	ULNHS
Total	**$**	**627.90**	

Michigan EEL (NRCs)

	Rate	USOC
DS1 Loop Admin	$ -	NR90R
Loop Design and CO Connection	$ -	NR90U
Loop Carrier Connection	$ -	NR90W
Transport Admin	$ 136.82	ORCMX
Transport Design and CO Connection	$ 339.17	NRBCL
Transport Carrier Connection	$ 209.19	NRBBL
Total	**$ 685.18**	

Missouri DS1 EEL (NRCs)

		Rate	USOC
DS1 Loop	$	136.63	U4D1X
DS1 Cross Connect	$	229.05	UCXHX
DS1 Loop Order	$	5.00	NR9W2
UDT DS1 EF	$	324.50	UENHX
DS1 Cross Connect	$	229.05	UCXHX
DS1 Transport Order	$	5.00	NR9W2
UDT DS1 Transport	$	455.35	ULNHS
Total	**$**	**1,384.58**	

Oklahoma DS1 EEL (NRCs)

		Rate	USOC
DS1 Loop	$	220.25	U4D1X
DS1 Cross Connect	$	101.70	UCXHX
DS1 Loop Order	$	3.33	NR9W2
UDT DS1 EF	$	285.81	UENHX
DS1 Cross Connect	$	101.70	UCXHX
DS1 Transport Order	$	3.33	NR9W2
UDT DS1 Transport	$	301.93	ULNHS
Total	**$**	**1,018.05**	

Texas DS1 EEL (NRCs)

		Rate	USOC
DS1 Loop	$	73.25	U4D1X
DS1 Cross Connect	$	57.08	UCXHX
DS1 Loop Order	$	2.58	NR9W2
UDT DS1 EF	$	73.25	UENHX
DS1 Cross Connect	$	57.08	UCXHX
DS1 Transport Order	$	2.58	NR9W2
UDT DS1 Transport	$	174.43	ULNHS
Total	**$**	**440.25**	

Wisconsin Rate Structure

Loop			
	Admin	$	138.62
	Design and CO Connection	$	433.60
	Carrier Connection	$	179.90
Transport			
	Admin	$	346.87
	Design and CO Connection	$	543.56
	Carrier Connection	$	516.53
	Clear Channel	$	271.14
	Total (excluding clear channel)	***$***	***2,159.08***